

EXHIBIT 6

Troi A. Bryant

1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ARTIS ELLIS,	:	
	:	
Plaintiff,	:	
	:	
Vs.	:	
	:	CIVIL ACTION NO.
EDUCATIONAL COMMISSION	:	4:14-cv-02126
FOR FOREIGN MEDICAL	:	
GRADUATES,	:	
	:	
Defendant.	:	

VIDEOTAPED / REALTIMED DEPOSITION OF

TROI A. BRYANT

SEPTEMBER 8, 2016

VIDEOTAPED / REALTIMED DEPOSITION of TROI A.
BRYANT, produced as a witness at the instance of the
Defendant, and duly sworn, was taken in the
above-styled and numbered cause on Thursday, the 8th
day of September, 2016, from 11:18 a.m. to 1:09 p.m.,
before Pat English-Arredondo, CSR, RMR, CRR in and for
the State of Texas, reported by machine shorthand in
realtime translation, at the law offices of Morgan,
Lewis & Bockius, LLP, 1000 Louisiana Street,
Suite 4000, Houston, Texas, pursuant to the Federal
Rules of Civil Procedure; that the Witness will read
the deposition.

Troi A. Bryant

2	<p>1 APPEARANCES</p> <p>2 COUNSEL FOR PLAINTIFF ARTIS ELLIS:</p> <p>3 Ms. Keenya R. Harrold</p> <p>4 KENNARD</p> <p>5 2603 Augusta Drive, 14th Floor</p> <p>6 Houston, Texas 77057</p> <p>7 Phone: 713.742.0900</p> <p>8 e-mail: keenya.harrold@kennardlaw.com</p> <p>9</p> <p>10 COUNSEL FOR DEFENDANT EDUCATIONAL COMMISSION FOR</p> <p>11 FOREIGN MEDICAL GRADUATES:</p> <p>12 Ms. Erin F. O'Driscoll</p> <p>13 MORGAN, LEWIS & Bockius, LLP</p> <p>14 1000 Louisiana, Suite 4000</p> <p>15 Houston, Texas 77002</p> <p>16 Phone: 713.890.5000</p> <p>17 e-mail: codriscoll@morganlewis.com</p> <p>18</p> <p>19 ALSO PRESENT:</p> <p>20 Ms. Artis Ellis</p> <p>21</p> <p>22 VIDEOGRAPHER:</p> <p>23 Mr. Jamie Rodgers</p> <p>24</p> <p>25 COURT REPORTER:</p> <p>Ms. Pat English-Arredondo, CSR, RMR, CRR, CLR</p>	4															
3	<p>1 INDEX</p> <p>2 PAGE</p> <p>3</p> <p>4 APPEARANCES..... 2</p> <p>5</p> <p>6 WITNESS: TROI A. BRYANT</p> <p>7</p> <p>8</p> <p>9 EXAMINATION BY MS. O'DRISCOLL 6</p> <p>10</p> <p>11 EXAMINATION BY MS. HARROLD 85</p> <p>12 FURTHER EXAMINATION BY MS. O'DRISCOLL 90</p> <p>13 FURTHER EXAMINATION BY MS. HARROLD 93</p> <p>14 FURTHER EXAMINATION BY MS. O'DRISCOLL 95</p> <p>15 FURTHER EXAMINATION BY MS. HARROLD 101</p> <p>16</p> <p>17</p> <p>18 CHANGES AND SIGNATURE..... 103</p> <p>19</p> <p>20 REPORTER'S CERTIFICATE..... 104</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	5															
4	<p>1 EXHIBITS INDEX</p> <p>2 VIDEOTAPED / REALTIMED DEPOSITION OF</p> <p>3 TROI A. BRYANT</p> <p>4 SEPTEMBER 8, 2016</p> <p>5 NOS.</p> <p>6</p> <table border="1"> <thead> <tr> <th>NUMBER</th> <th>DESCRIPTION</th> <th>PAGE</th> </tr> </thead> <tbody> <tr> <td>EXHIBIT 1</td> <td>Subpoena issued to Mr. Bryant, with attachments, 8 pages</td> <td>9</td> </tr> <tr> <td>EXHIBIT 2</td> <td>Personnel files for Mr. Bryant at ECFMG, top document titled "Notice to All Standardized Patients and Acknowledgement of Receipt," dated 11-3-08 and signed by Troi Bryant, Bates Nos. ECFMG-ELLIS 007267 - 239</td> <td>49</td> </tr> <tr> <td>EXHIBIT 3</td> <td>ECFMG Personnel Information Change Form, Bates ECFMG-ELLIS 007235 - 223</td> <td>63</td> </tr> <tr> <td>EXHIBIT 4</td> <td>Clinical Skills Evaluation Collaboration (CSEC) Ownership, Confidentiality, and Non-Disclosure Agreement, Bates ECFMG-ELLIS 007227-7231</td> <td>68</td> </tr> </tbody> </table>	NUMBER	DESCRIPTION	PAGE	EXHIBIT 1	Subpoena issued to Mr. Bryant, with attachments, 8 pages	9	EXHIBIT 2	Personnel files for Mr. Bryant at ECFMG, top document titled "Notice to All Standardized Patients and Acknowledgement of Receipt," dated 11-3-08 and signed by Troi Bryant, Bates Nos. ECFMG-ELLIS 007267 - 239	49	EXHIBIT 3	ECFMG Personnel Information Change Form, Bates ECFMG-ELLIS 007235 - 223	63	EXHIBIT 4	Clinical Skills Evaluation Collaboration (CSEC) Ownership, Confidentiality, and Non-Disclosure Agreement, Bates ECFMG-ELLIS 007227-7231	68	5
NUMBER	DESCRIPTION	PAGE															
EXHIBIT 1	Subpoena issued to Mr. Bryant, with attachments, 8 pages	9															
EXHIBIT 2	Personnel files for Mr. Bryant at ECFMG, top document titled "Notice to All Standardized Patients and Acknowledgement of Receipt," dated 11-3-08 and signed by Troi Bryant, Bates Nos. ECFMG-ELLIS 007267 - 239	49															
EXHIBIT 3	ECFMG Personnel Information Change Form, Bates ECFMG-ELLIS 007235 - 223	63															
EXHIBIT 4	Clinical Skills Evaluation Collaboration (CSEC) Ownership, Confidentiality, and Non-Disclosure Agreement, Bates ECFMG-ELLIS 007227-7231	68															
5	<p>1 EXHIBITS INDEX</p> <p>2 NUMBER DESCRIPTION PAGE</p> <p>3 EXHIBIT 5 Confidential letter dated 4-27-10 to Troy Bryant from Ann Jobe; Re: Acceptance of promotion to full-time position, Bates Nos. ECFMG-ELLIS 007215 - 7211 69</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9 EXHIBIT 6 Thank you letter for interview sent to Mrs. Ellis and Mr. Biggs from Troy Bryant, Bates ECFMG-ELLIS007213 75</p> <p>10</p> <p>11</p> <p>12</p> <p>13 EXHIBIT 7 Order/Notice to Withhold Income for Child Support," Bates ECFMG-ELLIS 006750 - 767 83</p> <p>14</p> <p>15</p> <p>16</p> <p>17 * * *</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	5															

2 (Pages 2 to 5)

DepoTexas, Inc.

Troi A. Bryant

11:20:29
11:20:32
11:20:38
11:20:38

11:20:39
11:20:41
11:20:43
11:20:46
11:20:49
11:20:49

11:20:50
11:20:59
11:21:01
11:21:02
11:21:03
11:21:10

11:21:10
11:21:23
11:21:38
11:21:40
11:21:41
11:21:44
11:21:45

11:21:48
11:21:49
11:21:51
11:21:52
11:21:54
11:21:55
11:21:59
11:21:59
11:22:00
11:22:05
11:22:08
11:22:08
11:22:09
11:22:10
11:22:10
11:22:13
11:22:13
11:22:16
11:22:16
11:22:19
11:22:23
11:22:23
11:22:26
11:22:29
11:22:47

6
1 THE VIDEOGRAPHER: Good morning. It's
2 Thursday, September 8, 2016. The time is approximately
3 11:18 a.m., and we are on the record.
4 THE REPORTER: We're taking this
5 pursuant to Federal Rules. Correct?
6 MS. O'DRISCOLL: Yes.
7 THE REPORTER: And you-all have chosen
8 to waive the reading of the 30(b)(5).
9 Sir, will you go ahead and raise your
10 right hand to be administered the oath?
11 TROI A. BRYANT,
12 being called as a witness, and having been duly sworn,
13 testified as follows:
14 THE WITNESS: Yes.
15 THE REPORTER: Thank you, sir.
16 EXAMINATION
17 BY MS. O'DRISCOLL:
18 Q. Can you state your full name for the record,
19 sir?
20 A. Troi Alan Bryant.
21 Q. Okay, Mr. Bryant. My name is Erin O'Driscoll
22 and I represent ECFMG in a matter that Ms. Artis Ellis
23 has filed, a lawsuit in federal court.
24 Do you understand I represent the company
25 and I do not represent you? Do you understand that?

7
1 A. Uh-huh.
2 Q. Okay. And are you represented at all by a
3 lawyer today?
4 A. Do I need one?
5 Q. You're just a fact witness. You're not a
6 party to this lawsuit, so --
7 A. No.
8 Q. I just wanted to make sure there wasn't
9 anything I wasn't aware of.
10 A. Oh, no, no, no.
11 Q. Okay. And Ms. Keenya Harrold, Ms. Artis
12 Ellis' lawyer, she does not represent you. Is that --
13 A. No, no. No, huh-uh.
14 Q. And if you wouldn't mind just letting me
15 finish my question before you start to respond? And
16 that's just so that it's very clear for the court
17 reporter so that -- because she can't type what we're
18 saying both at the same time.
19 A. Absolutely. Uh-huh.
20 Q. And if you could continue to answer
21 verbally --
22 A. Okay.
23 Q. -- and so just don't nod your head up and
24 down.
25 A. Okay.

8
1 Q. We do have a video here today, but just so
2 that we'll be able to read it on the written record, as
3 well, what your responses are.
4 A. Sure.
5 Q. Okay. Wonderful.
6 And if you don't understand my question,
7 if you could just please let me know, I'm happy to
8 rephrase it. And if you don't ask me to clarify or
9 rephrase it, then I'm just going to assume that you
10 understand my question.
11 Does that make sense?
12 A. Sure.
13 Q. Okay. Mr. Bryant, what did you do to prepare
14 for your deposition today?
15 A. Scheduled off to be here.
16 Q. Okay. Did you meet with anyone to discuss
17 the facts of this lawsuit or what the allegations are?
18 A. Well, I actually got some counsel from my
19 brother-in-law -- he's a judge -- because I've never
20 been to a deposition before.
21 Q. Okay. Have you looked up the pleadings or
22 any of the --
23 A. No.
24 Q. -- allegations in this matter?
25 A. No, no.

9
1 Q. And did you review any documents or anything
2 that may be -- that may be related to this matter in
3 any way?
4 A. No, other than the ones I signed, the
5 subpoena that I signed.
6 Q. Okay. And that's the subpoena that you were
7 served with?
8 A. Right, right.
9 Q. And the subpoena that you were served with
10 I'm going to mark as Exhibit No. 1.
11 (Marked was Bryant Exhibit No. 1.)
12 Q. (By Ms. O'Driscoll) Is this the subpoena
13 that you referenced a moment ago?
14 A. (Reviewing) Yes.
15 Q. And you were served by a process server and
16 given a witness fee to appear today?
17 A. Yes.
18 Q. And is that your signature on Page 2 towards
19 the bottom?
20 A. Yes.
21 Q. And if you could skip to the last page that's
22 listed as Exhibit A of that document --
23 A. Uh-huh.
24 Q. -- did you bring any documents with you today
25 that were responsive to these requests?

3 (Pages 6 to 9)

Troi A. Bryant

10

11:22:40 1 A. No. Other than communications, no.
 11:22:54 2 Q. I'm sorry?
 11:22:54 3 A. Other than communications, no.
 11:22:56 4 Q. And what do you mean by "communications"?
 11:22:58 5 A. Just my knowledge of whatever you're going to
 11:23:00 6 ask me. Nothing written.
 11:23:02 7 Q. And did you take a moment, when you received
 11:23:06 8 this subpoena, to review to see if you had any
 11:23:09 9 documents or things or communications to or from or
 11:23:08 10 between you or ECFMG before, during, or after your
 11:23:08 11 employment at ECFMG?
 11:23:19 12 A. Yes, I did.
 11:23:19 13 Q. And you didn't have any documents?
 11:23:21 14 A. No.
 11:23:24 15 Q. Okay. And that was Request No. 1 on that
 11:23:23 16 Exhibit A.
 11:23:29 17 A. Right, right.
 11:23:24 18 Q. And on Request No. 2, "All documents and
 11:23:27 19 things and communications to or from or between you and
 11:23:26 20 Artis Ellis (also known as Artis Fowler or Artis Harden
 11:23:28 21 or any variation thereof) from January 1, 2007 to
 11:23:29 22 present."
 11:23:41 23 Did you check and see if you had any
 11:23:43 24 documents responsive?
 11:23:43 25 A. No, I don't.

11

11:23:45 1 Q. And then No. 3, "All documents and materials
 11:23:46 2 reviewed by you in preparation for your deposition."
 11:23:48 3 You already said you didn't review
 11:23:51 4 anything.
 11:23:51 5 A. Right.
 1:23:52 6 Q. Okay. And have you ever spoken with
 11:23:53 7 Ms. Harrold or anyone in her office, in Artis Ellis'
 11:23:53 8 attorneys office, whether a paralegal or any other
 11:24:04 9 attorneys, prior to today?
 11:24:08 10 A. Briefly yesterday.
 11:24:13 11 Q. Okay. Did you speak -- what time of day
 11:24:15 12 yesterday?
 11:24:17 13 A. Late evening. I'm not sure.
 1:24:17 14 Q. And how long did you talk for?
 11:24:19 15 A. Five minutes.
 11:24:21 16 Q. Okay. And what did you talk about?
 11:24:23 17 A. She just wanted to make sure I was going to
 11:24:25 18 be here.
 11:24:15 19 Q. Okay.
 11:24:26 20 A. And that I knew where I was going.
 1:24:28 21 Q. Okay. And did you-all discuss anything else
 11:24:30 22 about the case or about Ms. Artis' allegations in the
 11:24:33 23 case?
 11:24:36 24 A. No.
 11:24:36 25 Q. Do you know what Ms. Ellis is alleging in

12

1 this case?
 2 A. Vaguely.
 3 Q. And how do you know that?
 4 A. Something has to do with our relationship or
 5 past relationship and employment. That's what I know.
 6 Q. Okay. Anything else?
 7 A. No.
 8 Q. And when you said "employment," is that
 9 employment at ECFMG?
 10 A. Yes. Yes, employment at ECFMG.
 11 Q. Because you-all both worked there at the same
 12 time?
 13 A. Yes. Yes, uh-huh.
 14 Q. And I just wanted to also mention just -- at
 15 the very beginning I meant to tell you if you need a
 16 break at any time, just feel free to let us know and
 17 we're happy to let you go to the restroom or get a
 18 drink or stretch.
 19 I don't think we're going to be here for
 20 very long, but I just wanted to make sure in case you
 21 need a break. I would just ask that you finish
 22 answering the question, if there is one pending --
 23 A. Sure.
 24 Q. -- before we take the break.
 25 A. Sure.

13

1 Q. And then also, as you know, you're under oath
 2 today as if you're testifying before a judge and jury
 3 and you understand that that's under penalty of
 4 perjury?
 5 A. Yes, ma'am.
 6 Q. Okay, great.
 7 And when you said just a moment ago, when
 8 I asked you about what this lawsuit was about, you said
 9 you had a vague knowledge about that.
 10 A. Uh-huh.
 11 Q. You referenced that it was -- that it was
 12 your understanding that it was about your relationship
 13 with Ms. Artis Ellis.
 14 A. Uh-huh.
 15 Q. How did you know that?
 16 A. I'm not sure. I don't remember how I know
 17 that. I just know that.
 18 Q. Was it through talking with Ms. Keenya
 19 Harrold?
 20 A. It could have been --
 21 Q. Okay.
 22 A. -- part of that conversation, I guess. I'm
 23 not sure.
 24 Q. And do you remember anything else that might
 25 have been discussed about the relationship with

Troi A. Bryant

<p>11:28:35 11:28:38 11:28:41 11:28:44 11:28:47 11:28:50 11:28:53 11:28:56 11:28:59 11:29:02 11:29:05 11:29:08 11:29:11 11:29:14 11:29:17 11:29:20 11:29:23 11:29:26 11:29:29 11:29:32 11:29:35 11:29:38 11:29:41 11:29:44 11:29:47</p>	<p style="text-align: right;">14</p> <p>1 Ms. Keenya or anybody else in her office? 2 A. No, I haven't spoken to anyone else in her 3 office. 4 Q. Have you spoken with Ms. Artis Ellis at any 5 time in the last two years prior to coming today, this 6 morning? 7 A. On occasion. During the holidays, I guess. 8 Q. Okay. And is that normal, for you-all to 9 talk during the holidays? 10 A. Well, at least text or -- yeah. 11 Q. Okay. 12 A. Yes. 13 Q. And do you-all text each other back pretty 14 freely? 15 A. I'm not sure what you mean by that. 16 Q. Well, how often? What's a normal week for 17 you-all to communicate as far as number of times? 18 A. It wouldn't be weekly. I would say 19 seasonally during the holidays. 20 Q. So during any of the holidays? 21 A. Christmas, Thanksgiving, New Year. Happy New 22 Year's. 23 Q. Okay. Mr. Bryant, are you currently married? 24 A. Yes. 25 Q. And what is your wife's name?</p>	<p style="text-align: right;">16</p> <p>1 ago, something. 2 Q. Okay. And how did you meet Ms. Ellis? 3 A. I can't recall exactly how I met her. I'm 4 not sure. Kind of like knew the same people, I guess. 5 Q. Did you-all go to school together? 6 A. Not really. 7 Q. I mean -- 8 A. We attended the same school, but we didn't go 9 to school together. 10 Q. But you attended the same school? 11 A. I'm older than her, so I think I was gone 12 already. I'm not sure how much older I am than her. I 13 vaguely remem -- I didn't know her very well. When we 14 were young people, I didn't know her very well. 15 Q. Okay. So you said you went to school -- but 16 you did attend the same schools? 17 A. Yes. 18 Q. Was it high school? 19 A. High school, yes. 20 Q. What about middle school? 21 A. No. Not that I know of. 22 Q. What about college? 23 A. No. 24 Q. Elementary school? 25 A. No.</p>
<p>11:29:50 11:29:53 11:29:56 11:29:59 11:30:02 11:30:05 11:30:08 11:30:11 11:30:14 11:30:17 11:30:20 11:30:23 11:30:26 11:30:29 11:30:32 11:30:35 11:30:38 11:30:41 11:30:44 11:30:47 11:30:50</p>	<p style="text-align: right;">15</p> <p>1 A. Jacquelyn. 2 Q. And how long have you been married to her? 3 A. 27, 28 years. 4 Q. And have you ever been married before that? 5 A. No. 6 Q. And do you have any children? 7 A. Yes. 8 Q. And how many children do you have? 9 A. Three. 10 Q. And what are their names? 11 A. Brittani, Troi and Ervin. 12 Q. And how old are they? 13 A. 29, 22 and 20. 14 Q. And -- 15 A. Or 19. He will be 20 soon. 16 Q. Sorry. Who will be -- 17 A. My youngest will be 20 in October. 18 Q. And what are their last names? 19 A. Bryant. 20 Q. And who are the mothers of those children? 21 Mother or mothers? 22 A. Jacquelyn is the mother of Troi and Ervin, 23 and Artis is the mother of Brittani. 24 Q. Okay. When did you meet Artis Ellis? 25 A. 20-plus years ago. 28 years ago, 29 years</p>	<p style="text-align: right;">17</p> <p>1 Q. And what high school did you attend? 2 A. Ross Shaw Sterling. 3 Q. And did you attend that school for all four 4 years of high school? 5 A. Yes. 6 Q. You said that you and Artis knew some of the 7 same people. 8 A. I would imagine because we went to the 9 same -- yes, I'm sure we did. 10 Q. Okay. 11 A. I'm not sure who they were, but... 12 Q. You don't remember their names? 13 A. No, no. 14 Q. You think that you may be a year or two older 15 than her? 16 A. At least. 17 Q. And did you-all attend the same church? 18 A. No. 19 Q. And did you and Ms. Ellis ever date? 20 A. No. 21 Q. Did you ever have any romantic involvement at 22 all? 23 A. Yes. 24 Q. And how long was that romantic involvement? 25 A. Once.</p>

5 (Pages 14 to 17)

Troi A. Bryant

<p>11:39:08 11:39:11 11:39:13 11:39:15 11:39:20 11:39:21 11:39:29 11:39:30 11:39:38 11:39:39 11:39:41 11:39:48 11:39:49 11:39:49 11:39:59 11:38:00 11:38:04 11:38:09 11:38:09 11:38:02 11:38:03 11:38:05</p>	<p style="text-align: right;">22</p> <p>1 19-year-old. 2 Did you have any discussions after that, 3 finding out she was pregnant? 4 A. Oh, yeah, the whole parent thing. I went 5 through all of that drama. It was, you know, a lot 6 going on, so... 7 Q. Right. Okay. And when you say "the whole 8 parent thing," what do you mean? Do you mean being a 9 parent with Ms. Ellis? 10 A. No. Our parents. Her parents being upset, 11 my parents being upset. Typical, "What are you doing?" 12 What have you been doing?" type of -- I had to explain 13 myself. 14 Q. Okay. And then did you propose to Ms. Ellis? 15 A. No. 16 Q. Were there any discussions at all about 17 getting married? 18 A. No. 19 Q. Did you talk to her throughout her pregnancy? 20 A. I'm sure, yes. 21 Q. And were you there when her daughter -- when 22 your daughter was born? 23 A. Yes. 24 Q. And did you help in raising Brittani? 25 A. We co-parented, yes.</p>	<p style="text-align: right;">24</p> <p>1 Brittani while she was growing up? 2 A. As often as I could. 3 Q. Did you live close by? 4 A. No, not close, no. I've always resided in 5 Spring. I think they lived somewhere south of Houston. 6 Q. And you lived in Spring during that time when 7 Brittani was a child? 8 A. Uh-huh. 9 Q. Okay. And so Jacquelyn would go and pick up 10 Ms. Ellis [sic]. And during this -- while Brittani was 11 growing up, would you and Ms. Ellis talk frequently 12 about Brittani? 13 A. As parents would, I guess, whenever there's 14 issues, I guess. 15 Q. And what types of issues would you talk 16 about? 17 A. I don't know. Teenager issues, raising a kid 18 issues, school, I guess. 19 Q. Do you have specific recollections of having 20 those types of conversations with Ms. Ellis on a 21 regular basis? 22 A. I don't remember every moment. No, I don't 23 have specific ... 24 Q. But you remember generally talking to her? 25 A. Uh-huh, yeah.</p>
<p>11:38:08 11:38:10 11:38:18 11:38:29 11:38:25 11:38:26 11:38:29 11:38:29 11:38:35 11:38:37 11:38:43 11:38:56 11:38:58 11:38:58 11:38:07 11:38:08 11:38:08 11:38:08 11:38:08 11:38:56 11:38:52 11:38:59 11:39:03 11:39:06 11:39:07</p>	<p style="text-align: right;">23</p> <p>1 Q. And when you say "co-parented," how did you 2 help in raising her together? 3 A. You know, guiding her, mentoring, feeding 4 her, clothing her. 5 Q. And so you were actively involved in her 6 upbringing? 7 A. Uh-huh. 8 Q. And where did Brittani live when she was a 9 baby? 10 A. With her mom. 11 Q. And would you go over and visit? 12 A. No, she was married. Ms. Ellis was married 13 shortly after that and so -- and I had a girlfriend, 14 Jacquelyn. 15 So my wife would pick her up from -- I 16 didn't visit, but I would get my daughter. I visited 17 with my daughter, yeah. 18 Q. So Jacquelyn would go and pick up your 19 daughter? 20 A. Uh-huh. 21 Q. And where would she pick her up? 22 A. I'm sure from the house. 23 Q. From Ms. Artis Ellis' house? 24 A. Uh-huh. 25 Q. And did you -- how often would you see</p>	<p style="text-align: right;">25</p> <p>1 Q. Regularly? 2 A. Co-parent, yes. 3 Q. And you said that she lived with Ms. Ellis as 4 a child. Did -- sorry, that Brittani lived with her 5 mom as a child. 6 Did Brittani ever live with you? 7 A. After she graduated college. 8 Q. And do you remember how old or what year that 9 was or how old she was? 10 A. I think she graduated in -- I'm not sure when 11 she graduated. '09, I guess. I'm not sure. 12 Q. Okay. And was it during that time period 13 when you were working at ECFMG? 14 A. No. I was actually -- I was in another 15 industry. 16 Q. Do you remember what year you started working 17 at ECFMG? 18 A. No. I think it's here somewhere 19 (indicating). I don't remember exactly when. 20 Q. Okay. We'll look at some documents on that 21 in a little bit. 22 A. Yeah. 23 Q. But you remember Brittani living with you -- 24 A. In '09. 25 Q. -- after she graduated from college?</p>

7 (Pages 22 to 25)

Troi A. Bryant

26

11:39:10

11:39:19

11:39:28

11:39:29

11:39:36

11:39:39

11:39:28

11:39:28

11:39:29

11:39:28

11:39:28

11:39:29

11:39:32

11:39:39

11:40:00

11:40:06

11:40:06

11:40:03

11:40:09

11:40:09

11:40:52

11:40:52

11:40:57

11:40:10

11:40:10

1 A. Uh-huh.

2 Q. And do you -- how long did she live with you
3 for?4 A. A couple of years. She lived with me, she
5 moved out, she moved back in. So there was a period
6 there, but I imagine it was a couple of years
7 altogether.8 Q. Okay. Did you help her pay her bills? Did
9 you -- strike that.10 Did you and Artis work out some sort of
11 financial arrangement while Brittani was growing up?

12 A. I paid child support.

13 Q. Did that come right out of your paycheck?

14 A. Uh-huh.

15 Q. And did you pay that child support throughout
16 the entire time that Brittani was a child?

17 A. Absolutely.

18 Q. Until she was 18?

19 A. Absolutely, yeah.

20 Q. And did you continue to financially support
21 Brittani after she was 18?

22 A. Uh-huh, yes.

23 Q. In what types of ways would you help her
24 financially?

25 A. As she needed. She was in college, so just

27

11:40:20

11:40:28

11:40:28

11:40:29

11:40:29

11:40:29

11:40:28

11:40:28

11:40:36

11:42:40

11:40:33

11:40:35

11:40:37

11:40:38

11:40:40

11:40:07

11:40:08

11:40:09

11:40:08

11:40:08

11:40:08

11:43:02

11:43:03

11:43:06

11:43:08

1 as a dad would.

2 Q. Food?

3 A. Yeah.

4 Q. Cars?

5 A. Yeah. All of that.

6 Q. Did you help with college tuition?

7 A. No. Fortunately, she "scholarshipped" most
8 of her education, so I was fortunate.

9 Q. Okay.

10 A. Very little, if any, that I can recall.

11 Q. So you helped on the necessities?

12 A. (Moving head up and down.)

13 Q. Did Brittani go on vacation with you and
14 Jacquelyn?

15 A. I'm sure she did.

16 Q. Do you recall her going on vacation?

17 A. Yeah.

18 Q. Did you -- did your family with Jacquelyn and
19 Brittani, did you ever take any vacations together with
20 Ms. Ellis?

21 A. Oh, no. No.

22 Q. Did you-all ever celebrate -- did you ever
23 celebrate holidays with Brittani growing up as a child?

24 A. With my family, sure.

25 Q. So she would come over for Christmas?

28

1 A. Oh, yes.

2 Q. Or Thanksgiving?

3 A. (Moving head up and down.)

4 Q. And did you -- do you remember what your
5 visitation was throughout Brittani growing up?6 A. Not specifically, no. Not exactly what it
7 was.

8 Q. Do you remember seeing her every week?

9 A. No, I didn't get a chance to see her every
10 week.

11 Q. Every other week?

12 A. I'm sure, at least.

13 Q. And during the summers when she was on school
14 break?

15 A. Uh-huh.

16 Q. Do you think you had a standard visitation
17 where it was every 1st, 3rd and 5th weekend and
18 summers.19 A. It probably was. Probably, yeah. I paid
20 child support, so whatever the rule was.21 Q. Okay. Did you also carry Brittani on your
22 medical insurance at any time when she was growing up?

23 A. Uh-huh.

24 Q. And your other children as well, Troi and
25 Ervin, did they also live with you?

29

1 A. Yes.

2 Q. And did -- and prior to college did Brittani
3 live with you --

4 A. No.

5 Q. -- except for when she was visiting?

6 A. No.

7 Q. And related to the child support and custody,
8 did you and Artis talk about what worked best for
9 you-all to decide how that was going to be handled?

10 MS. HARROLD: Objection, relevance.

11 Q. (By Ms. O'Driscoll) You can go ahead and
12 answer.13 A. I don't recall how that was decided. I'm
14 sure we came to an agreement. We didn't have -- we
15 didn't have problems, I guess. I'm trying to -- I
16 can't remember how that was done.

17 Q. So you never refused to pay child support?

18 A. Oh, no, no.

19 Q. You wanted to be actively involved in her
20 life?

21 A. Sure, yeah. She has my last name. Yeah.

22 Q. Okay. And are you and Brittani close?

23 A. I think so.

24 Q. And have you always been close?

25 A. Yes.

Troi A. Bryant

	30		32
111:43:20	1 Q. While she was growing up, did you go to her	1 Q. From college?	
111:43:22	2 school functions?	2 A. Uh-huh.	
111:43:23	3 A. Sure.	3 Q. And where did she go to college?	
111:43:24	4 Q. Did you go to parent-teacher conferences?	4 A. University of Texas.	
111:43:27	5 A. I'm sure I did.	5 Q. And was that a four-year degree?	
111:43:30	6 Q. And would you attend parent-teacher	6 A. Yes.	
111:43:32	7 conferences with Ms. Ellis?	7 Q. Did she go on to graduate school?	
111:43:34	8 A. No.	8 A. Yes.	
111:43:36	9 Q. You-all wouldn't be there talking to the	9 Q. And where did she go to graduate school?	
111:43:37	10 teacher?	10 A. Lamar University.	
111:43:38	11 A. I don't ever recall that, no.	11 Q. Did you say "Lamar"?	
111:43:41	12 Q. And throughout Brittani growing up, would you	12 A. Lamar University, yeah.	
111:43:43	13 talk to Ms. Ellis just on holidays; or was it more	13 Q. And has she graduated from Lamar?	
111:43:50	14 frequently than that?	14 A. Yes.	
111:43:51	15 A. I would say scasonally.	15 Q. Do you remember when she graduated?	
11:46:00	16 Q. Okay.	16 A. No. I don't remember the year, no.	
111:46:54	17 A. When we had to. You know, we were civil.	17 Q. Mr. Bryant, where do you currently work?	
111:46:57	18 Q. Because you were co-parenting?	18 A. I work for Austin Industrial.	
111:46:58	19 A. Right.	19 Q. And how long have you worked there?	
111:46:02	20 Q. So if Brittani was sick, you would talk about	20 A. Five years this October.	
111:46:03	21 it?	21 Q. And what's your position there?	
111:46:08	22 A. I don't know if I knew every time she was	22 A. I'm a HSE manager, health and safety manager	
111:46:08	23 sick. I can't say that, no.	23 Q. And have you had that same position the whole	
111:46:12	24 Q. Not every time; but, I mean, you knew what	24 entire time?	
111:46:14	25 was going on in Brittani's life when she was at her	25 A. No. They hired me as a tech. I've been a	
	31		33
11:47:03	1 mom's, correct?	1 manager the past four years.	
11:47:08	2 A. I would like to think I knew, yeah.	2 Q. I'm sorry?	
11:47:05	3 Q. Okay. Okay.	3 A. I've been a manager for the past four years.	
11:47:02	4 Did Brittani get married recently?	4 They hired me as a tech before that.	
11:47:10	5 A. Yes.	5 Q. Okay. And where did you work before Austin	
11:47:20	6 Q. Was it within the last couple of years?	6 Industrial?	
11:47:20	7 A. Yes. She's been married at least two years	7 A. ECFMG.	
11:47:29	8 now.	8 Q. And how long did you work there?	
11:47:28	9 Q. And were you involved in that wedding?	9 A. I'm not sure. I'm not sure if I was there	
11:47:25	10 A. Yes.	10 two years or not. I'm not sure if I made it two years	
11:47:30	11 Q. Did you help pay for the wedding?	11 Q. Do you remember how you came to work at	
11:47:33	12 A. No.	12 ECFMG?	
11:47:36	13 Q. Did you and your wife ever help Brittani buy	13 A. Vaguely, yes.	
11:48:00	14 cars when she was growing up or as a young adult during	14 Q. And how did you learn about that job?	
11:48:00	15 college?	15 A. My wife was working there.	
11:48:00	16 MS. HAROLD: Objection, relevance.	16 Q. And is that Jacquelyn?	
11:48:08	17 Q. (By Ms. O'Driscoll) You can answer.	17 A. Yes.	
11:48:08	18 A. I bought her a car.	18 Q. And how did you -- and what position did you	
11:48:10	19 Q. And what kind of a car was that?	19 apply for?	
11:48:12	20 A. A Honda.	20 A. It was standardized patient.	
11:48:12	21 Q. Do you remember when that was?	21 Q. And you found out about that position through	
11:48:18	22 A. Not exactly. After she -- for graduation	22 Jacquelyn?	
11:48:18	23 from college. Close to that.	23 A. Uh-huh.	
11:48:30	24 Q. It was a graduation present?	24 Q. Did you know -- do you remember how long	
11:48:32	25 A. Uh-huh.	25 Jacquelyn had been working there --	

9 (Pages 30 to 33)

Troi A. Bryant

34

11:40:02 1 A. No.
 11:40:03 2 Q. -- at that time?
 11:40:04 3 A. Huh-uh, no.
 11:40:08 4 Q. But did you know that Ms. Ellis worked at
 11:40:09 5 ECFMG?
 11:40:09 6 A. Yes.
 11:40:10 7 Q. And how did you know that?
 11:40:12 8 A. My wife worked there.
 11:40:14 9 Q. And your wife told you that?
 11:40:15 10 A. Yeah.
 11:40:16 11 Q. But --
 11:40:17 12 A. Pretty sure. I mean ...
 11:40:19 13 Q. And you also spoke with Ms. Ellis or texted
 11:40:20 14 with her on the holidays; so you knew where she worked,
 11:40:21 15 didn't you?
 11:40:22 16 A. I guess, yes. I guess that's how I knew,
 11:40:23 17 yeah. I didn't keep track of her. Ms. Ellis, I mean.
 11:40:24 18 Q. Right, right. But you would communicate
 11:40:25 19 throughout the holidays and so you knew where she
 11:40:26 20 worked, didn't you?
 11:40:27 21 A. I can't say that I did. Before my wife
 11:40:28 22 worked there, I can't say that I did, no.
 11:40:29 23 Q. But you knew she worked there while your
 11:40:30 24 wife --
 11:40:31 25 A. Yes.

35

11:50:42 1 MS. HARROLD: Objection, asked and
 11:50:43 2 answered.
 11:50:44 3 Q. (By Ms. O'Driscoll) You knew Ms. Ellis
 11:50:45 4 worked there during -- while Jacquelyn worked there?
 11:50:46 5 A. Yes. Yes, I did.
 11:50:47 6 Q. And did you know what her position was? I'm
 11:50:48 7 sorry. Let me make sure that's clear.
 11:50:49 8 Did you know what Artis Ellis' position
 11:50:50 9 was at ECFMG while your work wife was working there?
 11:50:51 10 A. I'm not sure if I did or not. I don't know
 11:50:52 11 if I knew what she did, or not.
 11:50:53 12 Q. Do you remember knowing that she ran the
 11:50:54 13 center?
 11:50:55 14 A. No, I wasn't sure she ran the center, no.
 11:50:56 15 Q. You found out that she ran the center when
 11:50:57 16 you were hired, correct?
 11:50:58 17 A. Well, actually, when I interviewed, I guess I
 11:50:59 18 found -- she wasn't, like, running the center when I
 11:51:00 19 was interviewed.
 11:51:01 20 Q. Was she running the center when you started
 11:51:02 21 working there?
 11:51:03 22 A. No.
 11:51:04 23 Q. Are you sure about that?
 11:51:05 24 A. Yeah. There was a guy named John. There was
 11:51:06 25 a guy named John running the center when I got there.

36

1 Q. Okay. And did you understand that on the day
 2 that you started that Ms. Ellis was the center manager?
 3 A. I thought I worked under John. I thought I
 4 worked for John.
 5 Q. And how long do you think you worked for
 6 John?
 7 A. I don't know. I'm not sure. I know he
 8 interviewed me. That's what I do remember. I am sure
 9 about that.
 10 Q. And how did you find out that you were going
 11 to be interviewed at ECFMG?
 12 A. I'm not sure. Correspondence, maybe a phone
 13 call or mail. I'm not sure how I found out I got the
 14 interview.
 15 Q. Had you met John before that interview? Had
 16 you met him before?
 17 A. I don't know. I don't know. I don't think
 18 so.
 19 Q. Did you ever -- and you said that Jacquelyn,
 20 your wife, work at ECFMG during that time when you
 21 interviewed at ECFMG?
 22 A. Right.
 23 Q. Had you ever gone to ECFMG functions --
 24 A. I had, yes.
 25 Q. -- with Jacquelyn?

37

1 A. Yes.
 2 Q. What kinds of functions did you go to?
 3 A. Like a Christmas party.
 4 Q. Any other functions?
 5 A. That's the only thing I remember, a holiday
 6 party or something.
 7 Q. Any baseball games?
 8 A. Maybe. Maybe.
 9 Q. Okay.
 10 A. Yeah. I probably went to a baseball game,
 11 yeah.
 12 Q. Okay. Do you remember how many functions you
 13 went to?
 14 A. No.
 15 Q. Okay. Do you remember, going to those
 16 functions, did you see Ms. Ellis at any of those
 17 functions?
 18 A. Uh-huh.
 19 Q. Okay. Would Brittani ever go with you to
 20 those functions?
 21 A. No.
 22 Q. Did -- would you and Ms. Ellis talk at those
 23 functions?
 24 A. Yes.
 25 Q. Because you were co-parenting with Brittani?

Troii A. Bryant

	42		44
11:58:08	1 Q. So everyone got along?	1 Q. Okay. But you-all got along well?	
11:58:40	2 A. Yes.	2 A. Yes.	
11:58:50	3 Q. Do you know if your wife, Jacquelyn, knew	3 Q. So you recall applying at ECFMG because	
11:58:54	4 Ms. Ellis before going to work at ECFMG?	4 Jacquelyn told you there was an opening?	
11:58:58	5 A. Could you ask me that again?	5 A. (Moving head up and down.)	
11:58:59	6 Q. Sure. Did Jacquelyn, your wife, know	6 Q. Do you remember ever applying for a promotion	
11:59:02	7 Ms. Ellis before she went to go work at ECFMG?	7 from the SP position?	
11:59:04	8 A. Yes.	8 A. Yes, I did.	
11:59:09	9 Q. And how did she know her?	9 Q. And what promotion did you apply for?	
11:59:10	10 A. She is the mother of my daughter. We were	10 A. Trainer.	
11:59:12	11 co-parenting.	11 Q. And did you get that position?	
11:59:13	12 Q. Right. So Jacquelyn is your daughter's	12 A. Yes.	
11:59:15	13 stepmom?	13 Q. What was the process of applying? What did	
11:59:17	14 A. Yes.	14 you have to do to apply for the trainer position?	
11:59:20	15 Q. And Jacquelyn knew Artis Ellis because	15 A. So I'm not sure of their process, but I think	
11:59:23	16 you-all were raising Brittani together?	16 you apply on-line. I sent in a resume', all of that	
11:59:27	17 A. Yes.	17 stuff.	
11:59:28	18 Q. You and Jacquelyn -- I know you said -- I	18 And then, over some period of time they	
11:59:32	19 think you said you were dating during that time period	19 scheduled the interviews in Houston, a lady from	
11:59:35	20 when Ms. Ellis was pregnant with Brittani. Was that	20 Philadelphia came through and did interviews, and	
11:59:36	21 right? Or you said you had a girlfriend, but I wasn't	21 sometime after that I was told I got the position.	
11:59:37	22 sure.	22 Q. Okay. And do you remember if there were	
11:59:39	23 A. She was born -- I started dating	23 other folks interviewing for that position?	
11:59:51	24 Jackie -- Brittani was really small, so like a few	24 A. Uh-huh.	
11:59:52	25 months, so...	25 Q. Do you remember how many folks?	
	43		45
11:59:52	1 Not while she was pregnant, but I know I	1 A. No. A lot.	
12:00:06	2 introduced Brittani to Jacquelyn when she was really	2 Q. Do you remember any of the names of the	
11:59:59	3 small, like within a couple of months, two or three	3 people that were interviewing for that promotion?	
11:59:59	4 months, or something like that.	4 A. No.	
12:00:06	5 Q. So Brittani grew up with her --	5 Q. Do you -- you remember interviewing with	
12:00:04	6 A. Yes, yes.	6 someone from -- who came in from Philly.	
11:57:28	7 Q. -- as a stepmom?	7 A. Yes.	
12:00:20	8 A. Yes, always. Even when we dated, yes.	8 Q. Did you interview with anyone else for that	
12:00:34	9 Q. And how long did you and Jacquelyn date	9 promotion?	
12:00:38	10 before getting married?	10 A. After I got through that, I interviewed with	
12:00:39	11 A. A year or two.	11 Artis and Brent.	
12:00:38	12 Q. And did Jacquelyn and Brittani get along	12 Q. Brent Biggs?	
12:00:38	13 really well while growing up?	13 A. Yes.	
12:00:38	14 A. Uh-huh. Yes, yes.	14 Q. And did you tell anyone at ECFMG that you and	
12:00:38	15 Q. You said Ms. Ellis and Jacquelyn got along	15 Ms. Ellis shared a daughter?	
12:00:38	16 very well while Brittani was growing up as well?	16 A. No.	
12:00:38	17 A. Not always, but we eventually got there.	17 Q. Did you tell Mr. Biggs that?	
12:00:37	18 Q. Okay. Do you remember any	18 A. No.	
12:00:40	19 specific -- anything specific that you're thinking of	19 Q. Do you ever remember telling any of your	
12:00:40	20 when you say "we eventually got there"?	20 co-workers that Brittani was your daughter?	
12:00:44	21 A. No. Just -- you know, we were young. We	21 A. No.	
12:00:43	22 were all pretty young. So it was -- it wasn't perfect,	22 Q. Do you remember Brittani ever going to any	
12:00:49	23 but nothing -- I don't remember any events or anything.	23 Christmas parties during the time when you worked there	
12:00:51	24 It just wasn't perfect. It wasn't a perfect	24 at ECFMG?	
12:00:52	25 circumstance, so ...	25 A. No.	

12 (Pages 42 to 45)

DepoTexas, Inc.

Troia A. Bryant

122 003:04
122 003:09
122 003:53
122 003:56
122 003:57
122 003:00
122 003:08
122 003:17
122 003:30
122 003:43
122 003:56
122 003:23
122 003:34
122 004:07
122 004:03
122 004:09
122 004:30
122 004:39
12:04:14
122 004:45
122 004:49
122 004:48
122 004:56
122 004:54
122 004:54

46
1 MS. HARROLD: Objection, asked and
2 answered.
3 A. No.
4 Q. (By Ms. O'Driscoll) Do you ever remember
5 showing any pictures of Brittani to Kristy Edens?
6 A. No, I don't remember doing that.
7 Q. And you didn't -- you didn't tell anyone in
8 management at ECFMG that you and Artis shared a
9 daughter?
10 A. No.
11 Q. Did Artis tell you not to tell anybody that
12 you and Brittani [sic] shared a daughter?
13 A. No.
14 Q. Did anyone at ECFMG know that Jackie was
15 Brittani's stepdaughter -- I'm sorry, stepmom. I
16 apologize.
17 A. I'm not sure if anybody there knew that
18 Brittani was my daughter.
19 Q. Okay.
20 A. I never discussed -- that wasn't workplace
21 discussion.
22 Q. You don't remember talking with any of the
23 other SPs or trainers about Brittani being your
24 daughter?
25 A. It's possible; but no, I don't remember it.

12:01:50
12:01:56
12:02:11
12:02:15
12:02:26
12:02:30
12:02:30
12:02:31
12:02:38
12:02:35
12:02:39
12:02:37
12:02:40
12:02:43
12:02:46
12:02:48
12:02:59
12:02:00
12:02:53
12:02:07
12:02:01
12:02:02

47
1 Q. But it's possible?
2 A. I guess, yeah.
3 Q. When you applied for that promotion as
4 trainer, you said you did, in fact, get it, correct?
5 A. Uh-huh.
6 Q. And was that a full-time position?
7 A. Yes.
8 Q. And you received benefits?
9 A. Yes.
10 Q. And who did you report to at that time as
11 full-time trainer?
12 A. Ms. Ellis and Brent.
13 Q. And do you recall Ms. Ellis doing any
14 evaluations for you while you were trainer?
15 A. I don't remember getting an evaluation. Like
16 I said, I don't even know how long I was there.
17 Q. Okay.
18 A. I don't remember an evaluation.
19 Q. Do you remember getting raises while you were
20 working there?
21 A. I don't. I don't remember.
22 Q. You don't remember if your wage increased
23 during the time?
24 A. When I went from SP to trainer, it certainly
25 did. But I don't remember -- I don't think I was there

48
1 long enough for a raise.
2 I'm not even sure if I did the position
3 for a year or not. I just -- I don't remember an
4 evaluation.
5 Q. Okay. When you applied for the job at ECFMG,
6 did you -- there is a question that asks, "Who do you
7 know that works at ECFMG?"
8 Did you list Ms. Ellis?
9 A. I'm sure I did if they asked it, yeah.
10 Q. When you started at ECFMG as an SP, do you
11 remember seeing Ms. Ellis when you started?
12 A. Yes.
13 Q. And was she surprised that you were there?
14 Did she know that you were going to be there?
15 A. I remember -- yeah, she knew I was there.
16 She knew I was going to be there.
17 Q. How did she know that?
18 A. I remember seeing her when I interviewed with
19 John.
20 Q. Okay. And did you talk with her then when
21 you interviewed with John?
22 A. I'm not sure. That's a busy place. I
23 remember John wet and sweaty and moving fast, so it's
24 busy. I'm sure it was, "Oh, hey." I'm sure it was in
25 passing.

49
1 Q. But Ms. Ellis wasn't -- she didn't act
2 surprised when she saw you when you started working at
3 ECFMG?
4 A. No.
5 Q. Because she knew that you were going to be
6 starting there?
7 A. I assume so, yes.
8 Q. And when you first start and you go through
9 orientation, is there some sort of a presentation on
10 that first day?
11 A. I don't remember the orientation process.
12 Q. I will mark this as Exhibit 2.
13 Mr. Bryant, if you could take a look at
14 this, we will walk through the pages together.
15 (Marked was Bryant Exhibit No. 2.)
16 A. Uh-huh.
17 Q. (By Ms. O'Driscoll) These are documents from
18 your personnel file at ECFMG.
19 A. Uh-huh.
20 Q. And if you wouldn't mind going to Page 2, do
21 you recognize that letter dated November 3rd, 2008?
22 A. Not particularly, but ...
23 Q. Is that your address, 3318 La Mer Lane,
24 Spring, Texas 77388?
25 A. Uh-huh.

13 (Pages 46 to 49)

Troi A. Bryant

02:18:00
02:18:06
02:18:19
02:18:38
02:18:58
02:19:02
02:19:07
02:19:08
02:19:13
02:19:15
02:19:18
02:19:21
02:19:23
02:19:26
02:19:29
02:19:33
02:19:34
02:19:38
02:19:39
02:19:43
02:19:48
02:19:49
02:19:54

58

1 Met Life?

2 **A. I resigned.**

3 Q. Do you remember what your salary was when you

4 were promoted to trainer?

5 **A. No, I don't.**

6 Q. Was it a salary position or an hourly

7 position?

8 **A. I'm not sure. I think it was salary. I'm**

9 **not sure. Whatever...**

10 Q. But you got a raise?

11 **A. Right. I did. It was ...**

12 Q. And if you could turn to the page that's

13 after the on-line application, so in the bottom lower

14 corner it's ECFMG-ELLIS 6997.

15 At the top of this page it says "ECFMG

16 New PTAN Employee Form."

17 Do you remember filling this form out?

18 **A. No, but clearly I did.**

19 Q. I'm sorry?

20 **A. I said: No, but clearly I did.**

21 Q. That's your handwriting?

22 **A. It looks like it, yes.**

23 MS. HARROLD: What's the page number?

24 MS. O'DRISCOLL: In the lower corner

25 it's 6997.

02:19:53
02:20:07
02:20:08
02:20:09
02:20:10
02:20:11
02:20:12
02:20:13
02:20:14
02:20:15
02:20:16
02:20:17
02:20:18
02:20:19
02:20:20
02:20:21
02:20:22
02:20:23
02:20:24
02:20:25
02:20:26
02:20:27
02:20:28
02:20:29
02:20:30
02:20:31
02:20:32
02:20:33
02:20:34
02:20:35
02:20:36
02:20:37
02:20:38
02:20:39
02:20:40
02:20:41
02:20:42

59

1 MS. HARROLD: Okay.

2 Q. (By Ms. O'Driscoll) Is that your handwriting

3 on 6997?

4 **A. It looks like it.**

5 Q. It looks like there's a couple of different

6 types of handwriting.

7 **A. That's not my handwriting (indicating).**

8 Q. Where it says "standardized patient"?

9 **A. Right.**

10 Q. But before that that is your handwriting?

11 **A. Looks like it, yeah.**

12 Q. And your hire date is 11-3-08?

13 **A. Uh-huh.**

14 Q. Is that correct?

15 **A. Uh-huh.**

16 Q. Where it says "Supervisor Name," it lists

17 "Artis Ellis." Correct?

18 **A. Uh-huh.**

19 Q. Do you also -- if you could skip a couple of

20 pages forward at 7277 --

21 **A. Uh-huh. Okay.**

22 Q. -- to the Clinical Skills Evaluation

23 Collaboration.

24 **A. Okay.**

25 Q. Do you remember filling out this document?

60

1 **A. No, I don't.**

2 Q. If you turn to the second page at 7279, is

3 that your signature under "In witness whereof"?

4 **A. Yes.**

5 Q. A then a few lines -- and that's dated

6 11-3-08?

7 **A. Uh-huh. Yes.**

8 Q. So were you -- it appears you were filling

9 all of these documents out on the same date. Is that

10 correct?

11 **A. Looks like it, uh-huh.**

12 Q. And then that's -- do you recognize that as

13 Artis Ellis' signature as your supervisor or manager

14 right below that?

15 **A. It looks like the previous ones, yes.**

16 Q. And you understood as a standardized patient

17 through this agreement, through the Clinical Skills

18 Evaluation, that you were going to be handling

19 confidential information?

20 **A. Yes.**

21 Q. And as a standardized patient, do you ever

22 remember -- were you ever sent home during an exam?

23 **A. Sent home?**

24 Q. Yes, involuntarily. Like, for example, if

25 you showed up and had a sore throat or had a bruise or

61

1 anything of that nature? Do you ever remember being

2 sent home as a standardized patient?

3 **A. No.**

4 Q. And I know you said that you and Ms. Ellis

5 talk or text regularly on holidays. Do you remember

6 the last time that you spoke with her prior to today?

7 **A. No.**

8 Q. Or texted with her?

9 **A. I can't remember.**

10 Q. Would it be within the last month?

11 **A. Maybe two or three months ago. I'm not sure.**

12 Q. And do you remember what you-all talked

13 about?

14 **A. No, huh-uh.**

15 Q. Do you remember when you first heard that

16 Ms. Ellis had filed a lawsuit against her former

17 employer?

18 **A. Years ago.**

19 Q. And how did you hear about it?

20 **A. I don't know. Scuttlebutt. I'm not sure how**

21 **I found out.**

22 Q. Did you hear it from Ms. Ellis?

23 **A. No.**

24 Q. When you say "years ago," what does that

25 mean? Few years? A couple of years? Do you remember?

Troi A. Bryant

66

12:26:32 1 during that time period that Ms. Ellis signed off on?
 12:26:36 2 A. I mean, clearly I did; but no, I don't
 12:26:38 3 remember it.
 12:26:39 4 Q. Okay.
 12:26:48 5 A. It might be important for you to know this
 12:26:50 6 was insignificant to me, so I don't remember all of
 12:26:51 7 these details.
 12:26:50 8 Q. Okay. But you remember working at ECFMG?
 12:26:53 9 A. Right, right.
 12:26:54 10 Q. During this time period you were working at
 12:26:58 11 least 20 hours a week?
 12:26:58 12 A. I'm not even sure if that was accurate, but
 12:27:03 13 that was -- something like that.
 12:27:04 14 Q. But it was a part-time job that you were
 12:27:05 15 going to --
 12:27:06 16 A. Yeah, right.
 12:27:08 17 Q. -- each week?
 12:27:08 18 A. Right.
 12:27:08 19 Q. Where Ms. Ellis was center manager?
 12:27:20 20 A. Right.
 12:27:23 21 Q. And how often would you see Ms. Ellis when
 12:27:23 22 you were at work?
 12:27:23 23 A. Sometimes I would. Sometimes I wouldn't. It
 12:27:26 24 depends. We're in an exam. We're isolated.
 12:29:29 25 Q. Okay.

67

22:29:30 1 A. I probably wouldn't see her if I was there.
 22:29:33 2 Twice I probably wouldn't see her.
 22:29:37 3 Q. I'm sorry. Twice you wouldn't see her?
 22:29:38 4 A. Twice in one week.
 22:29:39 5 Q. Okay. Did you-all have meetings in the
 22:29:39 6 mornings before the exam?
 22:29:39 7 A. With the trainers, uh-huh.
 22:29:39 8 Q. Would Ms. Ellis ever go to those meetings?
 22:29:39 9 A. Occasionally.
 22:29:40 10 Q. If you -- I'm going to mark this as
 22:29:40 11 Exhibit 4.
 22:29:40 12 During those morning meetings didn't
 22:29:40 13 Ms. Ellis conduct them?
 22:29:40 14 A. No, no, huh-uh.
 22:29:40 15 Q. Did she conduct some of them?
 22:29:40 16 A. No, I remember them being led by the
 22:29:40 17 trainers.
 22:29:40 18 Q. Okay.
 22:29:40 19 A. Because I did it as a trainer, but the
 22:29:40 20 morning meetings.
 22:29:40 21 Q. Did you as a trainer ever have to have
 22:29:40 22 meetings with the assistant manager and the center
 22:29:40 23 manager to kind of coordinate and get a game plan on
 22:29:40 24 exams?
 22:29:40 25 A. Not for exams. We had -- I guess, yes.

68

1 Yeah, we did.
 2 Q. So you would have meetings with Ms. Ellis --
 3 A. Right.
 4 Q. -- as part of your job duties?
 5 A. Right, right. As a trainer, yes.
 6 Q. As a trainer?
 7 A. Yes.
 8 Q. And that was pretty regular?
 9 A. I imagine it was, yeah.
 10 (Marked was Bryant Exhibit No. 4.)
 11 Q. (By Ms. O'Driscoll) We're going to mark as
 12 Exhibit 4 (tendering). This is ECFMG-ELLIS 7227 on the
 13 first page.
 14 This is another copy of the Clinical
 15 Skills Evaluation Collaboration, the Confidentiality
 16 and Non-Disclosure Agreement?
 17 A. Uh-huh.
 18 Q. Does that look familiar?
 19 A. Vaguely, yeah.
 20 Q. If you turn to the last page, is that your
 21 signature?
 22 A. Yes.
 23 Q. And that's dated January 10, 2011?
 24 A. Uh-huh.
 25 Q. And below "Supervisor," next to the line

69

1 "Supervisor or Manager," that's Artis Ellis' signature,
 2 correct?
 3 A. Yes.
 4 Q. And during this time in 2011 had you already
 5 been promoted to the trainer position?
 6 A. I don't know. You tell me. I'm not sure. I
 7 don't know what my promotion date was. I thought I saw
 8 it on one of these documents, but ...
 9 Q. Well, if we look back on --
 10 A. No, it wasn't 2010. I'm not sure when I was
 11 promoted. I was still part-time in 2010, so ...
 12 This is 2011. I'm not sure if I was or
 13 not.
 14 Q. I think I have another document that can help
 15 us on that, actually.
 16 We will mark this as Exhibit 5.
 17 (Marked was Bryant Exhibit No. 5.)
 18 Q. (By Ms. O'Driscoll) Could you take a look at
 19 Exhibit 5 on that first page?
 20 A. Uh-huh.
 21 Q. This letter is dated April 27, 2010. It's
 22 addressed to Troi Bryant, again at 3318 La Mer Lane.
 23 That was still your address?
 24 A. Yes.
 25 Q. "Dear Troi, this letter is to confirm your

Troi A. Bryant

74

12:33:22 1 A. That's my child. Absolutely.
 12:33:59 2 THE VIDEOGRAPHER: Counsel, can you give
 12:35:02 3 me a couple of minutes to change the tape?
 12:35:07 4 MS. O'DRISCOLL: Yes.
 12:44:05 5 THE VIDEOGRAPHER: 12:35. We are off
 12:35:08 6 the record.
 12:35:08 7 (Recess taken at 12:35 p.m., resuming at
 12:44:08 8 12:41 p.m.)
 12:44:08 9 THE VIDEOGRAPHER: 12:40. Back on
 12:44:26 10 record, beginning Disc 2.
 12:44:26 11 Q. (By Ms. O'Driscoll) Mr. Bryant, we're back
 12:44:28 12 on the record just after a brief break.
 12:44:29 13 Do you remember how long your wife,
 12:44:20 14 Jackie, worked at ECFMG before you came to work there?
 12:44:28 15 A. I would say she was there a year or so, but
 12:44:29 16 I'm not exactly. But she probably was there a year, I
 12:44:38 17 guess.
 12:44:38 18 Q. And what was her position there?
 12:44:58 19 A. Proctor.
 12:44:58 20 Q. Was she a proctor the whole time?
 12:44:53 21 A. I'm not sure. I'm not sure what she was
 12:44:56 22 hired for. That's what I remember her doing. I'm not
 12:45:02 23 sure why she was there.
 12:45:00 24 Q. And she still worked there, you said, when
 12:45:03 25 you came to work there?

75

12:45:33 1 A. Right. That's what she was doing when I
 12:45:39 2 worked there.
 12:45:44 3 Q. And how did Jackie hear about that job? Did
 12:45:47 4 you say through Ms. Ellis?
 12:45:48 5 A. No.
 12:45:48 6 MS. HARROLD: Objection, speculation.
 12:45:51 7 A. No, I have no idea how she heard about that
 12:45:53 8 job.
 12:45:57 9 Q. (By Ms. O'Driscoll) What did Jackie do
 12:45:58 10 before she came to work at ECFMG?
 12:45:59 11 A. Sometimes nothing. She was a housewife
 12:46:00 12 sometimes. Sometimes she wasn't.
 12:46:01 13 Q. Did she work at a dental office?
 12:46:02 14 A. She has dental background.
 12:46:03 15 Q. Do you know who hired Jackie?
 12:46:04 16 A. No.
 12:46:05 17 Q. Do you ever remember Ms. Ellis introducing
 12:46:06 18 you to John Repasch, the former center manager?
 12:46:07 19 A. I don't remember. I don't remember that.
 12:46:08 20 Q. I will mark as Exhibit 6 ECFMG-ELLIS 7213.
 12:46:09 21 (Marked was Bryant Exhibit No. 6.)
 12:46:10 22 Q. (By Ms. O'Driscoll) If you could take a look
 12:46:11 23 at this document, is that your signature in the lower
 12:46:12 24 right-hand corner?
 12:46:13 25 A. Uh-huh, yes.

76

1 Q. And do you remember what prompted this, this
 2 letter to Ms. Ellis and Mr. Biggs?
 3 A. I'm sure I was thanking them for the
 4 interview.
 5 Q. Okay. Is this the interview that's related
 6 to your promotion?
 7 A. I don't know. It had to be, if Briggs
 8 was there. It could be.
 9 Q. Do you think it was related to you coming on
 10 at ECFMG?
 11 A. That's what I'm not sure of.
 12 Q. Do you know if Mr. Biggs was working at ECFMG
 13 when you started?
 14 A. That's what I'm trying to remember. I'm not
 15 sure if he was or not. Oh, I think he was -- I think
 16 he was a trainer at the time.
 17 Q. When you started?
 18 A. Yeah, I think so. I think he was.
 19 Q. And do you remember, would there have been a
 20 reason that you would have interviewed with a trainer
 21 for your SP position?
 22 A. No, no. So this had to be for the promotion.
 23 I don't remember exactly. It had to be for the
 24 promotion, then.
 25 Q. Do you ever remember interviewing at all with

77

1 Ms. Ellis related to when you were initially hired as
 2 an SP?
 3 A. No.
 4 Q. You said you interviewed with John Repasch?
 5 A. I didn't remember his name; but yeah, that
 6 sounds right.
 7 Q. Okay. Did you ever tell Mr. Repasch that you
 8 have a child with Ms. Ellis?
 9 A. No.
 10 Q. You understood that Ms. Ellis was the
 11 assistant center manager, second in command during that
 12 time period in 2008, in the fall of 2008?
 13 A. Yes.
 14 Q. And you didn't mention that to Mr. Repasch?
 15 A. No.
 16 Q. I knew you said that Jackie helped you raise
 17 Brittani along with Ms. Ellis. You mentioned that you
 18 bought a car for Brittani as a college graduation
 19 present. Is that right?
 20 A. Yes, yes.
 21 Q. And was that during the time that Brittani
 22 was living with you?
 23 A. No. She was in school.
 24 Q. I thought it was her college graduation
 25 present.

Troi A. Bryant

	78	80
112:48:59	1 A. It was.	1 MS. HARROLD: Objection, relevance.
112:49:00	2 Q. Had she started her graduate program?	2 A. Yeah, Christmas, birthdays. Gifts, yeah.
112:49:03	3 A. No. She was home for the holidays. I bought	3 But not support. She's pretty frugal, pretty sharp
112:49:08	4 it that Christmas. She was graduating the next spring.	4 kid, so ...
112:49:08	5 We just gave it to her then. She was still at UT.	5 Q. (By Ms. O'Driscoll) Okay. And you said you
112:49:29	6 Q. So it was an early graduation present?	6 heard that Artis left ECFMG at some point. You said
112:49:36	7 A. Yeah.	7 you didn't hear why she left?
112:49:39	8 Q. And you said "we gave it to her." Did you	8 A. Circumstances, I don't recall.
112:49:52	9 and Jackie buy that for her?	9 Q. Did you know that ECFMG had a policy in place
112:49:56	10 A. (Moving head up and down.)	10 against hiring relatives or anyone with a personal
112:49:59	11 Q. Did Jackie cosign on that car?	11 relationship?
112:50:06	12 A. I don't know.	12 A. No.
112:50:06	13 Q. And that was a Honda?	13 Q. If a policy -- have you ever worked anywhere
112:50:06	14 A. Uh-huh.	14 that had a policy like that?
112:50:08	15 Q. Do you remember -- you said you thought it	15 A. I probably have, but never paid much
112:50:12	16 was around 2009?	16 attention to it.
112:50:19	17 A. I don't remember. Close to that, yeah.	17 Q. As manager at your current employer, do you
112:50:26	18 Q. And if you started working at ECFMG in 2008,	18 ever make hiring decisions?
112:50:29	19 based on the documents that we reviewed, did that	19 A. Yes.
112:50:39	20 refresh your recollection that you were working at	20 Q. And promotion decisions?
112:50:26	21 ECFMG in 2009 when you bought the car?	21 A. Yes.
112:50:28	22 A. I guess so, yes.	22 Q. And if you were ever interviewing -- if you
112:50:29	23 Q. And that was -- you said that Brittani lived	23 were interviewing Artis, if she was applying at your
112:50:30	24 with you for a period of time after college?	24 job, would you let your employer know that she was the
112:50:32	25 A. Uh-huh.	25 mother of your daughter?
	79	81
112:50:33	1 Q. Was that after she graduated from UT?	1 A. That's not relevant.
112:50:34	2 A. It was sometime after that. She didn't move	2 Q. How is that not relevant?
112:50:36	3 straight in with me. She lived by herself, then she	3 A. It's not relevant. I'm hiring her for her
112:50:46	4 had a roommate for a while. She got into -- so it	4 skills, not her relationship.
112:50:00	5 might have been after.	5 Q. But if there is a policy in place that states
112:50:03	6 Because she got into a Ph.D. program at	6 that you're supposed to divulge and disclose any
112:50:00	7 U of H. So I'm not -- I'm not sure. She was	7 personal relationships whatsoever, would you feel like
112:50:55	8 constantly in school during that time, so I'm not sure	8 you had an obligation to follow that policy?
112:50:28	9 of the time periods.	9 A. No.
112:50:34	10 Q. But you think it was sometime after she	10 MS. HARROLD: Objections. Calls for
112:50:29	11 graduated from UT?	11 speculation.
112:50:26	12 A. I'm sure it was after that. I'm just not	12 A. Absolutely not. Absolutely not.
112:50:26	13 sure where she was in her education. I'm not sure if	13 Q. (By Ms. O'Driscoll) If there was a policy in
112:50:29	14 it was during her Master's or Ph.D. I think it was for	14 place?
112:50:58	15 her Ph.D. program.	15 MS. HARROLD: Objection, calls for
112:51:00	16 Q. And were you helping her -- when she was	16 speculation.
112:51:00	17 living by herself or with a roommate, was that in an	17 A. I wouldn't -- I wouldn't think it was
112:51:02	18 apartment?	18 relevant.
112:51:03	19 A. Uh-huh.	19 Q. (By Ms. O'Driscoll) If the policy in place
112:51:04	20 Q. Would you help her financially during that	20 is created to prevent conflicts of interest so that all
112:51:08	21 time?	21 management is aware of any bias that may or may not
112:51:51	22 A. No, no. I didn't have to. She was working.	22 exist, could you --
112:51:56	23 I think she was teaching then. Yeah.	23 MS. HARROLD: Same objection.
112:51:58	24 Q. You bought her the car. But would you buy	24 Q. (By Ms. O'Driscoll) -- could you see as a
112:51:56	25 her things as your daughter during that time?	25 manager how that would be something important?

Troi A. Bryant

<p>122:53:43 122:53:49 122:53:44 122:53:43 122:53:49 122:53:52 122:53:53 122:53:59 122:53:59 122:54:07 122:54:04 122:54:09 122:54:06 122:54:13 122:54:16 122:54:19 122:54:23 122:54:23 122:54:24 122:54:24 122:54:27 122:54:28 122:54:36 122:54:33 122:54:34</p>	<p style="text-align: right;">82</p> <p>1 MS. HARROLD: Same objection. 2 A. At my business we hire -- on my site right 3 now I have a father and three sons working there. I 4 have a husband and a wife working for the same company 5 there. I have a father and a daughter working for the 6 exact same company on the exact same site. 7 My son just went through a vigorous, 8 vigorous interview process that lasted weeks. They 9 still hired my son, same job site, same company. 10 Q. And you said you don't think your current 11 employer has a policy like that, correct? 12 A. I know we don't. We have -- yeah, I know we 13 don't. 14 Q. So if ECFMG has a policy that requires that 15 personal relationships of any sort should be disclosed 16 to prevent conflicts of interest, if that policy 17 exists, do you believe that that should have been 18 disclosed? 19 A. No. 20 MS. HARROLD: Objection, asked and 21 answered. Objection, calls for speculation. 22 A. I don't. 23 Q. (By Ms. O'Driscoll) What about if the person 24 that's being hired is supervising that person in the 25 personal relationship?</p>	<p style="text-align: right;">84</p> <p>1 A. Uh-huh. 2 Q. So I just wanted to get clarification why 3 there was actually a court order entered related to the 4 child support issue. 5 MS. HARROLD: Objection, relevance. 6 Q. (By Ms. O'Driscoll) You can answer. 7 A. I don't know. 8 Q. Do you recall? 9 A. I mean, yeah, I'm looking at it. Yeah, sure. 10 Q. Do you recall why there was a court order put 11 in place? 12 MS. HARROLD: Objection, relevance. 13 Objection, asked and answered. 14 A. We wanted to establish support for the child. 15 I mean, it wasn't -- it was to establish support for 16 Brittani, financial support. 17 Q. (By Ms. O'Driscoll) But you had been paying 18 child support all along, correct? 19 A. Absolutely. 20 Q. Okay. All throughout her childhood? 21 A. Absolutely. 22 Q. And you were very involved in her upbringing? 23 A. Sure. 24 Q. And you worked with Ms. Ellis to raise 25 Brittani?</p>
<p>2:54:24 2:54:24 2:54:28 2:54:23 2:54:29 2:54:48 2:54:48 2:54:59 2:53:01 2:53:02 2:53:05 2:53:06 2:53:08 2:53:08 2:53:22 2:53:23 2:53:26 2:53:28 2:53:29 2:53:32 2:53:33 2:53:38 2:53:38 2:53:40</p>	<p style="text-align: right;">83</p> <p>1 A. Absolutely. 2 MS. HARROLD: Objection, calls for 3 speculation. 4 Q. (By Ms. O'Driscoll) It should be divulged? 5 A. Yeah. 6 Q. One more exhibit. We will mark it as 7 Exhibit 7. This is ECFMG, first page is 6750. 8 (Marked was Bryant Exhibit No. 7.) 9 Q. (By Ms. O'Driscoll) Mr. Bryant, I know that 10 you testified that there was -- that you paid child 11 support for Brittani to Ms. Ellis. 12 Do you recall any orders being entered by 13 the court related to child support? 14 A. Pardon me? 15 Q. Do you recall any orders being signed by a 16 judge in court -- 17 A. Yes. 18 Q. -- related to child support? 19 A. Yes. 20 Q. And do you remember why those orders were 21 entered? 22 A. Why they were entered? 23 Q. You had mentioned earlier that you and 24 Ms. Ellis had a very civil relationship and co-parented 25 Brittani.</p>	<p style="text-align: right;">85</p> <p>1 A. Yes. 2 Q. And Jackie worked with you, also, and 3 Ms. Ellis -- 4 A. Yes. 5 Q. -- to raise Brittani? 6 A. Yes. 7 Q. Have you understood all of my questions, sir? 8 A. I think I have. 9 Q. Okay. 10 A. I've tried to. 11 Q. Okay. 12 MS. O'DRISCOLL: I will pass the 13 witness. 14 (Following proceeding commenced at 12:55 p.m.) 15 EXAMINATION 16 BY MS. HARROLD: 17 Q. Hi, Mr. Bryant. How are you? 18 A. Tired. 19 Q. I understand, and I'm not going to try to 20 keep you here very long. But my name is Keenya 21 Harrold. I represent Ms. Ellis in the legal matter 22 against ECFMG. 23 I'm going to ask you a couple of 24 questions, follow-up questions, but I understand that 25 you have to get back to work.</p>

22 (Pages 82 to 85)

DepoTexas, Inc.

Troi A. Bryant

<p>12:53:08 12:53:30 12:53:32 12:53:40 12:53:48 12:53:49 12:53:28 12:53:22 12:53:24 12:53:22 12:53:22 12:53:33 12:53:35 12:53:37 12:53:40 12:53:42 12:53:00 12:53:04 12:53:04 12:53:09 12:53:50 12:53:50 12:53:54 12:53:59 12:53:58</p>	<p style="text-align: right;">86</p> <p>1 A. Uh-huh. 2 Q. Let me first apologize for even you having to 3 take out time to come down here and do a deposition. 4 one, about a one-night-stand that happened when you 5 were 19 years old and a relationship with your daughter 6 that had nothing to do with your employment. So I 7 apologize for making you come downtown. 8 A. Thank you. 9 MS. O'DRISCOLL: Objection, form. 10 Assumes facts in evidence and mischaracterizes 11 evidence. 12 Q. (By Ms. Harrold) During our five-minute 13 conversation on yesterday you remember that I told you 14 just to be honest in your deposition. Correct? 15 A. Yes. 16 Q. And I told you that the phone call was not to 17 persuade you in any way. Is that right? 18 A. Yes, ma'am. 19 Q. You testified earlier that you found out 20 about the part-time position from your wife. Is that 21 correct? 22 A. Yes. 23 Q. Not from Ms. Ellis? 24 A. I did not, yes. 25 Q. And Ms. Ellis did not interview you for that</p>	<p style="text-align: right;">88</p> <p>1 A. No. 2 Q. So you were not terminated for not listing 3 Ms. Ellis on your application as a relative. Is that 4 right? 5 A. No. 6 Q. And you were not terminated for not telling 7 John about Brittani. Is that right? 8 A. No. 9 Q. In fact, what caused you to leave ECFMG? 10 A. I resigned. 11 Q. And what caused you to resign? 12 A. I was going back to industry. I had a better 13 opportunity. 14 Q. And you listed Jackie on your application 15 because she was your wife. Right? 16 A. Yes. 17 Q. So you consider your wife your relative. Is 18 that right? 19 A. Yes, yes. 20 Q. Are you and Ms. Ellis relatives? 21 A. No, we're not. 22 Q. Were you guys ever married? 23 A. No. 24 Q. In a domestic partnership of any kind? 25 A. No.</p>
<p>122 556:39 122 556:41 122 556:02 122 556:02 122 556:06 122 556:08 122 556:09 122 556:11 122 556:12 122 556:13 122 556:14 122 556:15 12:58:16 122 556:17 122 556:17 122 556:20 122 556:20 122 556:22 122 556:22 122 556:23 122 556:24 122 556:26 122 556:26 122 556:26 122 556:27 122 556:28</p>	<p style="text-align: right;">87</p> <p>1 part-time position. Is that correct? 2 A. That's correct. 3 Q. And do you remember reporting to Ms. Ellis 4 when you were working part-time? 5 MS. O'DRISCOLL: Objection, asked and 6 answered. 7 A. No, I remember reporting to the trainer and 8 John. That's what I remember. 9 Q. (By Ms. Harrold) And you testified that 10 Ms. Ellis did not interview you for the promotion, 11 right? It was someone in Philadelphia? 12 MS. O'DRISCOLL: Objection, form. 13 A. That's true. 14 MS. O'DRISCOLL: Mischaracterizes 15 evidence. 16 Q. (By Ms. Harrold) Also, in regards to the 17 promotion, you found out about that promotion 18 from -- did you find out from your wife? Or how did 19 you find out about that promotion opportunity as a 20 trainer? 21 A. Through the other trainers. 22 Q. So Ms. Ellis did not encourage you or tell 23 you about that position. Is that right? 24 A. No. 25 Q. Were you terminated from ECFMG?</p>	<p style="text-align: right;">89</p> <p>1 Q. Are you guys related by blood? 2 A. No. 3 Q. Adoption? 4 A. No. 5 Q. So she's never been your spouse? 6 A. No. 7 Q. She definitely is not your child, right? 8 A. No, no. 9 Q. Not your grandchild? 10 A. No. 11 Q. Not your parent? 12 A. No. 13 Q. Grandparent? 14 A. No. 15 Q. Are you and Ms. Ellis siblings? 16 A. No. 17 Q. Are you her uncle? 18 A. No. 19 Q. Is she your aunt? 20 A. No. 21 Q. What about, is she your niece? 22 A. No. 23 Q. Are you her nephew? 24 A. No. 25 Q. Are you guys cousins?</p>

23 (Pages 86 to 89)

Troi A. Bryant

02:58:29
12:58:30
02:58:32
02:58:33
02:58:35
02:58:36
02:58:38
02:58:39
02:58:40
02:58:41
02:58:43
02:58:44
02:58:47
02:59:09
02:59:04
02:59:02
01:00:56
02:59:09
02:59:09
02:59:10
02:59:12
02:59:14
02:59:17
02:59:29

90

1 A. No.
2 Q. Have you guys ever lived together?
3 A. No.
4 Q. In an intimate, personal committed
5 relationship?
6 A. No.
7 Q. Were you guys in a relationship when you guys
8 were teenagers?
9 A. No.
10 Q. Were you ever engaged to be married?
11 A. No.
12 Q. Do you consider Ms. Ellis to be your
13 significant other?
14 A. No.
15 MS. HARROLD: I will pass the witness.
16 (Following proceeding commenced at 12:59 p.m.)
17 FURTHER EXAMINATION
18 BY MS. O'DRISCOLL:
19 Q. Mr. Bryant, I just have a couple of follow-up
20 questions.
21 Was Ms. Ellis involved in the orientation
22 and the paperwork when you were hired?
23 A. I don't recall.
24 Q. After the Philadelphia person interviewed you
25 for the promotion to trainer --

02:59:30
02:59:30
02:59:32
02:59:34
02:59:39
02:59:32
02:59:42
02:59:44
02:59:44
02:59:46
12:59:47
02:59:48
02:59:50
02:59:51
02:59:54
12:59:56
01:00:02
01:00:03
01:00:04
01:00:09
01:00:24
01:00:24
01:00:26
01:00:29

91

1 A. Right.
2 Q. -- you testified that you then interviewed
3 with Ms. Ellis to receive that promotion. Correct?
4 A. Brent and Ms. Ellis, according to this
5 (indicating).
6 Q. And you testified, in fact, that you recalled
7 interviewing with Ms. Ellis for that promotion,
8 correct?
9 A. Brent and Ms. Ellis, yes.
10 Q. But Ms. Ellis was there?
11 A. Yes.
12 Q. And to your knowledge, she approved the
13 promotion. Correct?
14 A. I would assume so.
15 Q. Well, I mean, based on the paperwork that we
16 looked at, she signed off as your supervisor, didn't
17 she?
18 A. Okay, yeah, sure.
19 Q. You also mentioned that you and Ms. Ellis
20 were co-parenting Brittani throughout her childhood --
21 A. Yes.
22 Q. -- and throughout growing up and throughout
23 college, correct?
24 A. Sure.
25 Q. I mean, is that correct?

92

1 A. Yes.
2 Q. Okay.
3 A. I've never ceased my relationship with my
4 daughter.
5 Q. Okay. And that relationship with your
6 daughter was also tied to Ms. Ellis because that was
7 her mother, correct?
8 A. Not as an adult. No, that wouldn't be true
9 as an adult. My daughter was away at college. I had
10 very little interaction with Ms. Ellis.
11 Q. Well, you texted her on holidays and you
12 talked with her on holidays. Correct?
13 A. That's not a relationship. To me, that's not
14 a relationship.
15 Q. Do you text strangers?
16 A. Absolutely not.
17 Q. So co-parenting with someone, that is a
18 relationship, when you're co-parenting with someone,
19 correct?
20 A. Okay. Sure.
21 Q. Do you agree with me?
22 A. Sure.
23 Q. And it would be also intimate to have a
24 sexual encounter with someone, wouldn't it?
25 A. Oh, yes.

93

1 Q. And during the time period when you worked at
2 ECFMG, Ms. Ellis was the assistant manager and/or the
3 center manager for that entire time?
4 A. Yes, ma'am.
5 Q. And that was a personal relationship that you
6 had Ms. Ellis in co-parenting Brittani, correct?
7 A. Yes.
8 MS. O'DRISCOLL: Pass the witness.
9 (Following proceeding commenced at 1:02 p.m.)
10 FURTHER EXAMINATION
11 BY MS. HARROLD:
12 Q. At the time that you were at ECFMG, Brittani
13 was already in college. Is that right?
14 A. Yeah.
15 MS. O'DRISCOLL: Objection. He --
16 A. I guess.
17 MS. O'DRISCOLL: -- wasn't sure of the
18 timing.
19 Q. (By Ms. Harrold) At the time -- Brittani
20 graduated from the University of Texas in 2004. Does
21 that sound right?
22 MS. O'DRISCOLL: Objection. Facts not
23 in evidence.
24 MS. HARROLD: I'm asking him a question.
25 You asked if she graduated in 2009. I'm asking him a

Troi A. Bryant

01:09:28
01:09:31
01:09:33
01:09:33
01:09:35

102		104	
1	MS. O'DRISCOLL: We will reserve our	1	IN THE UNITED STATES DISTRICT COURT
2	questions for trial.	2	FOR THE SOUTHERN DISTRICT OF TEXAS
3	Thank you, Mr. Bryant.	3	HOUSTON DIVISION
4	THE VIDEOGRAPHER: 1:09. We are off the	4	ARTIS ELLIS, :
5	record.	5	Plaintiff, :
6	(Proceedings concluded at 1:09 p.m.)	6	Vs. :
7	* * *	7	: CIVIL ACTION NO.
8		8	EDUCATIONAL COMMISSION : 4:14-cv-02126
9		9	FOR FOREIGN MEDICAL :
10		10	GRADUATES, :
11		11	Defendant. :
12		12	REPORTER'S CERTIFICATION
13		13	VIDEOTAPED / REALTIMED DEPOSITION OF
14		14	TROI A. BRYANT
15		15	SEPTEMBER 8, 2016
16		16	I, Pat English-Arredondo, CSR, RMR, CRR, CLR,
17		17	Certified Shorthand Reporter in and for the State of
18		18	Texas, hereby certify to the following:
19		19	that the witness, TROI A. BRYANT, was duly sworn by
20		20	the officer and that the transcript of the oral
21		21	deposition is a true record of the testimony given by
22		22	the witness;
23		23	I further certify that pursuant to FRCP Rule
24		24	30(f)(1) that the signature of the deponent:
25		25	_____x_____ was requested by the deponent or a party
			before the completion of the deposition and returned
			within 30 days from date of receipt of the transcript.
			If returned, the attached Changes and Signature Page
			contains any changes and the reasons therefor;
103		105	
1	Artis Ellis vs.	1	_____ was not requested by the deponent or a party
2	Educational Commission for Foreign Medical Graduates	2	before the completion of the deposition.
3	VIDEOTAPED / REALTIMED DEPOSITION OF	3	I further certify that I am neither counsel for,
4	TROI A. BRYANT	4	related to, nor employed by any of the parties or
5	SEPTEMBER 8, 2016	5	attorneys in the action in which this proceeding was
6	CHANGES AND SIGNATURE	6	taken, and further that I am not financially or
7	PAGE LINE CHANGE REASON	7	otherwise interested in the outcome of the action.
8	_____	8	Certified to by me this 13th day of September,
9	_____	9	2016.
10	_____	10	
11	_____	11	
12	_____	12	
13	_____	13	Pat English-Arredondo
14	_____	14	Pat English-Arredondo, CSR, RMR, CRR, CLR
15	_____	15	Texas CSR No. 3828
16	_____	16	Expiration Date: 12/31/2017
17	_____	17	DepoTexas, Inc.
18	_____	18	Firm Registration No. 95
19	_____	19	13101 Northwest Freeway, Suite 210
20	_____	20	Houston, Texas 77040
21	_____	21	Phone: 888.893.3767
22	_____	22	
23	_____	23	
24	_____	24	
25	_____	25	
1	I, TROI A. BRYANT, have read the foregoing		
2	deposition and hereby affix my signature that same is		
3	true and correct, except as noted above.		
4	TROI A. BRYANT		
5	Job No.: 299093		
			Job No. 299093

27 (Pages 102 to 105)

DepoTexas, Inc.

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

ARTIS ELLIS

Plaintiff

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES*Defendant*

Civil Action No. 4:14-cv-02126

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: TROI BRYANT, 3318 La Mer Lane, Spring, Texas 77338-4145
or where he may be found

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Morgan, Lewis & Bockius LLP, 1000 Louisiana,
Suite 4000, Houston, TX 77002

Date and Time: 09/08/2016 11:00 am

The deposition will be recorded by this method: STENOGRAPHICALLY AND BY VIDEOTAPE

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: SEE THE ATTACHED "EXHIBIT A."

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/23/2016

CLERK OF COURT

OR

Stefanie R. Moll

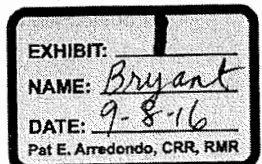
Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES, who issues or requests this subpoena, are: STEFANIE R. MOLL, MORGAN, LEWIS & BOCKIUS, 1000 LOUISIANA, SUITE 4000, HOUSTON, TEXAS 77002; 713-890-5000 STEFANIE.MOLL@MORGANLEWIS.COM

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served whom it is directed. Fed. R. Civ. P. 45(a)(4).



AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 4:14-cv-02126

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any) Troi Bryant
on (date) 8-25-16.

☒ I served the subpoena by delivering a copy to the named individual as follows: to Mr. Troi Bryant
at 3318 La Mer Lane, Spring TX 77338 (Harris County)
on (date) 8-29-16; or

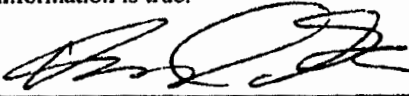
☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ 40⁰⁰ # 4260.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 8-29-16


Server's signature
DAVID A GARZA
Authorized Private Process Server
TX SERVER LIC# SCH-502
Exp 7-31-2017
Printed name and title

4202 Shennard Houston TX
Server's address
77092

Additional information regarding attempted service, etc.:

Mr. R. B. J. I
Troi A. Bryant I

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer, or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has, must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.*

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

AO 88A (Rev 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

ARTIS ELLIS

Plaintiff

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES

Defendant

Civil Action No. 4:14-cv-02126

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: TROI BRYANT, 3318 La Mer Lane, Spring, Texas 77338-4145
or where he may be found

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Morgan, Lewis & Bockius LLP, 1000 Louisiana, Suite 4000, Houston, TX 77002	Date and Time: 09/08/2016 11:00 am
--	------------------------------------

The deposition will be recorded by this method: STENOGRAPHICALLY AND BY VIDEOTAPE

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: SEE THE ATTACHED "EXHIBIT A."

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/23/2016

CLERK OF COURT

OR

Stefanie R. Moll

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES, who issues or requests this subpoena, are: STEFANIE R. MOLL, MORGAN, LEWIS & BOCKIUS, 1000 LOUISIANA, SUITE 4000, HOUSTON, TEXAS 77002; 713-890-5000 STEFANIE.MOLL@MORGANLEWIS.COM

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 4:14-cv-02126

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named individual as follows: _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ARTIS ELLIS,

Plaintiff,

VS.

CIVIL ACTION NO. 4:14-cv-02126

Jury Demanded

**EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES,**

Defendant.

**DEFENDANT EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL
GRADUATES' NOTICE OF INTENTION TO TAKE THE
ORAL DEPOSITION OF TROI BRYANT**

TO: TROI BRYANT, 3318 La Mer Lane, Spring, Texas 77338-4145 or where he may be found.

Pursuant to Federal Rules of Civil Procedure 30 and 45, Defendant Educational Commission for Foreign Medical Graduates will take the oral deposition of TROI BRYANT on September 8, 2016 beginning at 11:00 a.m. and continuing until completion. The deposition will be taken before a certified court reporter at the offices of Morgan, Lewis & Bockius LLP, 1000 Louisiana Street, Suite 4000, Houston, Texas 77002. The deposition may be videotaped. All counsel are invited to attend.

Dated August 24, 2016

Respectfully submitted,

/s/ Stefanie R. Moll

Stefanie R. Moll

State Bar No. 24002870

Federal ID No. 22861

smoll@morganlewis.com

1000 Louisiana, Suite 4000

Houston, Texas 77002

(713) 890-5000 - Telephone

(713) 890-5001 - Facsimile

Of Counsel:

Erin E. O'Driscoll

State Bar No. 240460

Federal ID No. 582983

eodriscoll@morganlewis.com

MORGAN, LEWIS & BOCKIUS, LLP

1000 Louisiana, Suite 4000

Houston, Texas 77002

(713) 890-5000 - Telephone

(713) 890-5001 - Facsimile

ATTORNEYS FOR DEFENDANT
EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of August 2016, the foregoing was served via Federal Express to:

Alfonso Kennard, Jr.

Keenya R. Harrold

KENNARD RICHARD P.C.

2603 August Drive, Suite 1450

Houston, Texas 77057

Troi Bryant

3318 La Mer Lane

Spring, Texas 77338-4145

/s/ Erin E. O'Driscoll

Erin E. O'Driscoll

EXHIBIT A

DUCES TECUM OF DOCUMENTS AND TANGIBLE ITEMS REQUESTED

REQUEST NO. 1:

All documents and things and communications to or from or between you and ECFMG before, during or after your employment at ECFMG.

REQUEST NO. 2:

All documents and things and communications to or from or between you and Artis Ellis (also known as Artis Fowler or Artis Harden or any variation thereof) from January 1, 2007 to present.

REQUEST NO. 3:

All documents or materials reviewed by you in preparation for your deposition.